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January 27, 2016

Hon Glenn T. Suddaby
Federal Building and U.S. Courthouse
PO Box 7367
Syracuse NY 13261-7367

RE: UNITED STATES OF AMERICA vs. STRONG
IND. NO. 14-cr-273

Dear Judge Suddaby:

I am in receipt, via the ECF system, of Mr. Strong's letter to you requesting "[his] entire case file" so that he can perfect his appeal. Please be advised that, contrary to Mr. Strong's assertion I have responded to every letter I've received from him. I have no letters in my file from him requesting his entire file, nor is there any record of him filing such a letter request through the Court, which would be reflected in the docket. He has filed such letter requests with the Court before, including one requesting that I file his Notice of Appeal (which had been filed weeks before his letter was sent).

I have received calls from family members requesting the file and I have told them all the same thing, that, to the best of my knowledge, Willie has all the necessary documents from his file (I sent him copies of all pertinent documents throughout the pendency of his case) and that all the documents he could rely on for his appeal would be obtainable through the PACER/ECF system. (Please note also the attached letter from Mr. Strong's sister requesting the transcript of Mr. Strong's sentencing, which I had never requested since I was not going to handle Mr. Strong's appeal.) I have also told them that, as is the case with all Federal drug conspiracy cases, the file was voluminous, but to have him contact me if there were any specific documents he was seeking and I would see if I could obtain them for him. I never heard anything from Mr. Strong in response. I have also spoken with Mr. Strong's Appellate Counsel.

I received a telephone call on Thursday, January 21, 2016 from one of Mr. Strong's family members stating that Willie was seeking his file. I told her the same thing I had told family members previously. I also told her that the entire Record on Appeal was maintained electronically on the court's CM/ECF system and that Willie needed to request these documents from his appellate counsel who could get them through the e-filing system. She was going to relay this information to Mr. Strong and, given the time frame, his most recent letter may have been filed before she spoke with him.

Respectfully yours,

FRANK POLICELLI, ESQ.

FP:ms

**UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT**

UNITED STATES OF AMERICA,

vs.

**CERTIFICATE OF SERVICE
DOCKET NO. 15-2992**

**WILLIE STRONG JR.,
Defendant-Appellant**

CERTIFICATE OF SERVICE

I, Frank Policelli, hereby certify that on January 27, 2016, I electronically filed the foregoing Letter Response with the Clerk of the United States Court of Appeals for the Second Circuit using its CM/ECF system, which would then electronically notify the proper CM/ECF participants on this case

s/Frank Policelli
